

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

PETER M. GALLIGAN,

Plaintiff,

v.

ADTALEM GLOBAL EDUCATION  
INC., f/k/a DEVRY EDUCATION  
GROUP; ADTALEM GLOBAL  
HEALTH, INC. f/k/a DEVRY MEDICAL  
INTERNATIONAL, INC.; ROSS  
UNIVERSITY SCHOOL OF MEDICINE  
SCHOOL OF VETERINARY  
MEDICINE (ST. KITTS) LIMITED; and  
DOES 1 THROUGH 50

Defendants.

Case No. 1:17-cv-06310

Hon. Joan H. Lefkow

**DEFENDANTS' MOTION TO DISMISS PLAINTIFF'S  
SECOND AMENDED COMPLAINT**

Defendants Adtalem Global Education Inc. (ATGE), Adtalem Global Health, Inc. (AGH), and Ross University School of Medicine School of Veterinary Medicine (St. Kitts) Limited (RUSVM) hereby moves to dismiss Plaintiff's Second Amended Complaint for the reasons stated in their supporting memorandum of law, filed on this same date.

**DATED: March 27, 2018**

Respectfully submitted,

ADTALEM GLOBAL EDUCATION  
INC.; ADTALEM GLOBAL HEALTH,  
INC.; ROSS UNIVERSITY SCHOOL OF  
MEDICINE SCHOOL OF  
VETERINARY MEDICINE (ST. KITTS)  
LIMITED

By: s/ Brian Stolzenbach

Brian Stolzenbach  
[bstolzenbach@seyfarth.com](mailto:bstolzenbach@seyfarth.com)  
Megan E. Troy  
[mtroy@seyfarth.com](mailto:mtroy@seyfarth.com)  
SEYFARTH SHAW LLP  
233 S. Wacker Drive, Suite 8000  
Chicago, IL 60606  
Telephone: (312) 460-5000  
Facsimile: (312) 460-7000

**CERTIFICATE OF SERVICE**

I do hereby certify that I have caused a true and correct copy of the foregoing by filing a copy with the Court's CM/ECF system, which will send notification to the following, on this 27th day of March, 2018:

Michael W. Ford, Esq.  
Law Offices of Michael W. Ford  
4 Timberwood Lane  
Riverwoods, IL 60015  
[mfordski@aol.com](mailto:mfordski@aol.com)

Emil T. Bayko  
Porter Hedges LLP  
1000 Main Street, 36th Floor  
Houston, Texas 77002  
[tbayko@porterhedges.com](mailto:tbayko@porterhedges.com)

s/Brian Stolzenbach